## SCURA, WIGFIELD, HEYER, STEVENS & CAMMAROTA, LLP

1599 Hamburg Turnpike Wayne, New Jersey 07470 Telephone: 973-696-8391

dstevens@scura.com
David Stevens, Esq.
Counsel for Debtor

## UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY

In re:

Louisa F. Correa,

Debtor.

Chapter 11 Case No. 19-31542 VFP Judge: Vincent F. Papalia

## CERTIFICATION OF LOUISA F. CORREA IN OPPOISTION TO MOTION FOR RELIEF OF STAY SOUGHT BY BAYVIEW LOAN SERVICING, LLC.

- I, Louisa F. Correa, do hereby certify the following:
- I am the debtor in the captioned matter and make this certification from personal knowledge.
- 2. I make this certification in opposition to the motion filed by Bayview Loan Servicing, LLC seeking relief of stay so that it may prosecute a foreclosure action.
- 3. The certification of post-petition payments relied upon by the movant fails to account for all payments made. I did make a payment in February 2020 which is unaccounted for.
- 4. While acknowledging that all post -petition payments have not been made, I request a hearing and consideration of the circumstances which resulted in the delinquency.

Case 19-31542-VFP Doc 44 Filed 05/06/20 Entered 05/06/20 15:03:29 Desc Main

Document Page 2 of 2

5. The District of New Jersey was among those areas with a significant number of

identified and projected cases of COVID-19. On March 21, 2020 Gov. Phil Murphy

ordered all non-essential retail businesses in New Jersey to close.

6. I am a dentist and own my own practice. Dentists were required to close to the

public. My inability to make mortgage payments were a direct result of mandatory shut-

down of my business.

7. I anticipate being able to re-open in May, at least on a partial basis. I expect that I

will be able to make May's payment before the return date of this hearing and to cure the

remaining delinquency over a six month period.

I hereby certify that the foregoing statements made by me are true. I am aware that

if any of these statements are willfully false, I am subject to punishment.

Dated: May 6, 2020

/s/ Louisa F. Correa

Louisa F. Correa